Mike Bromley

Vice President, Enterprise Government Solutions

Equifax Workforce Solutions

2330 Ball Drive

St. Louis, MO 63146

February XX, 2020

Dear Mr. Bromley,

The American Public Human Services Association (APHSA) is a bipartisan, nonprofit membership organization representing state and local health and human services agencies that works with members to influence modern policies and practices that support the health and well-being of children and families.

APHSA works with our members to promote opportunities for more efficient and cost-effective delivery of services, promote interoperability of systems, and have stable and predictable funding for essential organizational functions. Through feedback from numerous state and local members across different sectors of the human services system, it is apparent that our members are encountering challenges in their use of Equifax Workforce Solutions’ *The Work Number®* product that need to be resolved in order for the tool to be aligned with our shared vision for the future state of human services.

The following concerns, while not exhaustive, summarize common issues expressed by a significant cross-section of our membership.

* **Significant Rising Costs** – Over the past several years, state agencies report exponentially rising costs for their use of *The Work Number®*. As prices continue to increase, states are being left in the untenable position of deciding whether to abandon the use of automated eligibility verification checks or make cuts to other critical administrative functions.
* **Managing Number of Verification Checks** – In addition to rising per unit prices, states are facing obstacles managing the number of verification checks performed by users. This issue is partially a result of federal policies that preclude sharing of verification information for a single client across different funding streams. However, features within *The Work Number®* also make it difficult for managers to meter usage and control duplicative or unnecessary verification checks. Access to data points that can help states better target verification checks without excessive fees for such access can help states more effectively use the product.
* **Unanticipated Charges** – In addition to rising costs per verification match and a rise in the number of verification matches being made, states are also incurring other fees and charges that compound the challenges they are experiencing. Many states report monthly “maintenance fees” recently being added to their contracts and as new employers are added in the middle of contracts, states are forced to either accept additional charges to include these vendors or rely on outdated data.
* **Standard Access for Child Support Programs** – Child support programs report difficulties either retaining or gaining access to their standard service for no-cost verifications from Equifax when the company is being used by an employer to respond to such verification requests. Furthermore, similarities in design of Equifax’s no-cost verification tool and the paid service for child support programs can result in inadvertent costs being incurred.

Given the aforementioned challenges, our membership would like to work directly with Equifax Workforce Solutions to resolve challenges related to existing usage of *The Work Number®* so that the tool can be a viable option in long-term plans for state human services agencies systems and processes and integrate into USDA’s broader system modernization efforts. It is our hope that through engaging Equifax Workforce Solutions in direct and candid conversations, we can create a space for you to better understand the issues faced by our members and identify solutions that will help states build modern platforms that increase their capacity to meet the needs of children and families.

We look forward to this dialogue. Please contact Matthew Lyons, APHSA Director of Policy & Research, at [mlyons@aphsa.org](mailto:mlyons@aphsa.org) to discuss next steps.

Sincerely,

Belit Burke

Chair

American Association of SNAP Directors

Matthew Lyons

Director, Policy & Research

American Public Human Services Association

Leslie Henderson

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National Association for Program Information and Performance Management

Babette Roberts

Chair

National Association of State TANF Administrators